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May 12, 2015

Writer's Direct Access
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Via Electronic Filing

Ex Parte

Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., SW
Washington, D.C. 20554

**Re: Request of ACD Telecom, LLC, to be Certified as a Part 90 Frequency
Coordinator on Public Safety Frequencies, PS Docket No. 14-148**

Dear Ms. Dortch:

On May 8, 2015, Ali Shahnami of ACD Telecom and the undersigned met with Michael Wilhelm and Brian Marengo of the Public Safety and Homeland Security Bureau and Rodney Conway of the Wireless Telecommunications Bureau. The purpose of the meeting was to highlight the public interest benefits of ACD Telecom being certified as a Public Safety coordinator.

Consistent with ACD Telecom's Request for Certification as a Frequency Coordinator for the Public Safety frequencies and its Reply Comments submitted on October 23, 2014, Mr. Shahnami discussed ACD's technical, regulatory, and engineering background as they pertain to frequency coordination and spectrum management. He recounted ACD's experience as a frequency coordination contractor to several of the certified Public Safety frequency coordinators and the objective practices that all frequency coordinators must follow.

Several other points were communicated. First, despite the Commission's policy of promoting competition among Part 90 frequency coordinators,¹ the number of recognized frequency coordinating committees actively engaged in frequency coordination has declined. Second, in response to questions raised by other parties that ACD Telecom lacks the requisite "representativeness," ACD Telecom noted that numerous public safety agencies filed in support

¹ *Public Safety and Homeland Security Bureau Seeks Comment on Request of ACD Telecom, LLC, to be Certified as a Part 90 Frequency Coordinator of Public Safety Frequencies*, PS Docket No. 14-148, Public Notice, DA 14-1292, 29 FCC Rcd. 10535, 10636 (PSHSB 2014).

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of ACD Telecom's request and no questions were raised regarding its engineering expertise or objectivity.

ACD also discussed the ongoing uncoupling of the concept of representativeness on the one hand and performance of frequency coordination functions on the other.

ACD noted that a longstanding B/I/LT coordinator is actively marketing its frequency coordination services to public safety eligibles with the apparent endorsement of a certified public safety frequency coordinator. Copies of this B/I/LT coordinator's recent announcements were provided. In addition, it was noted that another association maintaining a longstanding B/I/LT frequency coordinator is now "entirely dedicated to representing the business interests of the wireless infrastructure industry." A screenshot of the association's home page was provided. In addition, it was noted that a contractor for another certified frequency coordinator directly bills public safety applicants for frequency coordination services without reference to the certified public safety frequency coordinator.

Should you have any questions, please contact me. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. Douglas Jarrett", with a stylized flourish at the end.

C. Douglas Jarrett

Attachments

cc: Michael Wilhelm
Brian Marenco
Rodney Conway

From: Ila Dudley <info@bmail36.shg31.bmsend.com> on behalf of Ila Dudley
<info@enterprisewireless.org>
Sent: Thursday, April 30, 2015 9:02 AM
To: Jarrett, Douglas
Subject: Call EWA for Public Safety Licensing

[View this email in your browser](#)

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3 MYTHS ABOUT SPECTRUM

MYTH
1

Only a few consultants know how to secure exclusive channels through little known analytical methods.

REALITY: There are no secret methods or unique analytical processes that provide anyone an advantage in identifying the availability of exclusive channels. The identification of exclusive use channels in the bands below 470 MHz are the product of Part 90 rules compliance and documented co-channel and adjacent channel contour analyses. If a consultant tells you otherwise, be wary ... very wary. Rely on spectrum experts who are familiar with the applicable rules and the critical analyses that should be performed – like EWA's professionals – to have confidence that every possible solution has been explored to secure exclusive use channels.

MYTH
2

You have only a few choices when it comes

2

to selecting a public safety frequency advisory committee.

REALITY: Actually you have multiple options. If you trust EWA to professionally handle your Industrial/Business licensing and spectrum requirements, why not trust EWA to handle your public safety needs? In cooperation with FCCA/IMSA – certified public safety frequency advisory committees – EWA can provide the same level of service you have come to expect from EWA. If you think this approach costs you more, EWA will refund any fees that exceed alternative public safety frequency coordination solutions ... guaranteed.

MYTH
3

It's virtually impossible to keep up on all of the spectrum policies and rules.

REALITY: Become a member of EWA and you have access to an organization that is participating in every single spectrum and regulatory issue of importance to our business. Want answers regarding rules, licensing requirements or interference assistance? Call EWA. Need spectrum solutions? Call EWA. EWA's membership includes business enterprises, equipment manufacturers and representatives, communication service providers and sales/service providers. Join your colleagues and let EWA become your wireless advocate.

We welcome your questions. Contact us at:

1-800-482-8282 or

Customer.Service@EnterpriseWireless.org

www.EnterpriseWireless.org



Adelstein on C-Span's "The Communicators"

PCIA President & CEO Jonathan Adelstein discusses the vital role wireless infrastructure plays in **spurring job growth, innovation, and economic investment** and how **PCIA members are making making leading-edge communications technology available** to all Americans.

Watch the [full episode of C-Span's "The Communicators"](#)

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PCIA Board of Directors Elects New Officers – Wireless Infrastructure Industry Veteran “Tam” Murray to Chair

May 1, 2015 / Alexandria, VA – The Board of Directors of PCIA - The Wireless Infrastructure Association this week elected new officers during PCIA's Wireless Infrastructure Show in Hollywood, Florida. Wireless infrastructure industry veteran Thomas “Tam” Murray, the Founder & Managing Member of Community Wireless Structures, is the new PCIA... [Read more](#)

PCIA Responds to FCC Move on 3.5 GHz

ENABLING WIRELESS COMMUNICATIONS

PCIA's mission is to help our members succeed in enabling wireless communications.

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April 17, 2015 / Alexandria, VA - Jonathan Adelsteinm President & CEO of PCIA - The Wireless Infrastructure Association issued the following statement today in response to the Federal Communications Commission's adoption of spectrum-sharing rules that create a new three-tiered commercial radio service spanning 3550 MHz to 3700 MHz: "PCIA is... [Read more](#)

[PCIA Statement on OSHA Tower Safety Inquiry](#)

April 14, 2015 / Alexandria, VA - PCIA - The Wireless Infrastructure Association issued the following statement today in response to the public notice by the Occupational Safety and Health Administration (OSHA) soliciting comment on tower construction and maintenance safety issues: "Workforce safety and improved network quality are critical issues for PCIA and... [Read more](#)

[Former Hill Staffer and Glover Park Group Executive Matt Mandel Named PCIA Head of Legislative Affairs](#)

April 13, 2015, Alexandria, VA - Jonathan Adelstein, the President and CEO of PCIA - The Wireless Infrastructure Association, today announced that former long-time Hill staffer and Glover Park Group executive Matt Mandel will join PCIA as Head of Legislative Affairs, effective immediately. In this newly created capacity, Mandel will... [Read more](#)

[PCIA Statement on Motion to Intervene re FCC Broadband Infrastructure Order](#)

April 3, 2015 / Alexandria, VA - PCIA - The Wireless Infrastructure Association released the following statement regarding a motion it filed today to intervene on behalf of the FCC Order that requires municipalities to expedite their review of tower modification applications: "PCIA strongly believes that the FCC's October 2014 Infrastructure Order... [Read more](#)

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